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*Attorneys for Defendant The State of Nevada, ex  
rel. its Department of Corrections*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

DONALD WALDEN JR, NATHAN  
ECHEVERRIA, AARON DICUS, BRENT  
EVERIST, TRAVIS ZUFELT, TIMOTHY  
RIDENOUR, and DANIEL TRACY on behalf  
of themselves and all others similarly situated,

Plaintiffs,

v.

THE STATE OF NEVADA, *EX REL.* ITS  
NEVADA DEPARTMENT OF  
CORRECTIONS, and DOES 1-50,

Defendants.

Case No.: 3:14-cv-00320-MMD-WGC

**STIPULATION FOR EXTENSION OF  
TIME TO FILE PLAINTIFFS' MOTION  
FOR CLASS CERTIFICATION  
PURSUANT TO FRCP 23 AND  
DEFENDANTS' MOTION TO  
DECERTIFY FLA COLLECTIVE  
ACTION**

**(First Request)**

IT IS HEREBY STIPULATED AND AGREED by and between Plaintiffs, Donald  
Walden Jr., Nathan Echeverria, Aaron Dicus, Brent Everist, Travis Zufelt, Timothy Ridenour,  
and Daniel Tracy, on behalf of themselves and all others allegedly similarly situated  
("Plaintiffs"), by and through their counsel of record, and Defendant State of Nevada, *ex rel.* its

1 Department of Corrections (“NDOC”), by and through its counsel of record, that the time in  
 2 which the Parties shall have to file Fed. R. Civ. P. 23 and FLSA decertification motions shall be  
 3 extended past the current deadline of Friday, December 22, 2017 (ECF No. 121) as follows:

4 1) Plaintiffs’ Motion for FRCP 23 Class Certification shall be filed on or before,  
 5 Wednesday, January 31, 2018. Defendants’ Opposition to FRCP 23 Class Certification shall be  
 6 filed on or before, Wednesday February 28, 2018. Plaintiffs’ Reply in support of Plaintiffs’  
 7 FRCP 23 Class Certification shall be filed on or before Wednesday, March 21, 2018.

8 2) Defendants’ Motion to Decertify FLSA Collective action shall be filed on or  
 9 before, Wednesday, January 31, 2018. Plaintiffs’ Opposition to Decertify shall be filed on or  
 10 before, Wednesday February 28, 2018. Defendants’ Reply in support of Defendants’ Motion to  
 11 decertify shall be filed on or before Wednesday, March 21, 2018.

12 The case involves class certification, decertification of a previously certified collective  
 13 action, and complex legal arguments. The Parties have engaged in discovery to create a detailed  
 14 factual record. The Parties request the additional time in light of the recently completed expert  
 15 depositions, the extensive discovery in the form of multiple site inspections, voluminous  
 16 disclosures and written discovery, depositions of five (5) PMKs, seven (7) named Plaintiffs,  
 17 twenty-five (25) opt-ins Plaintiffs, and in order to allow for previously planned counsel and staff  
 18 vacations scheduled to take place over the end of the year holidays.

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Counsel certifies that this request is made in good faith and not for the purposes of delay.

Dated this 12th day of December 2017.

Dated this 12th day of December 2017

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WILSON ELSE MOSKOWITZ EDELMAN  
& DICKER LLP

/s/ Leah L. Jones

/s/ Richard I. Dreitzer

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*Attorneys for Defendant State of Nevada,  
ex rel. its Department of Corrections*

**ORDER**

**IT IS SO ORDERED.**

DATED this \_\_\_\_\_ day of December 2017.

\_\_\_\_\_  
UNITED STATES MAGISTRATE JUDGE